

Rev. 3/19

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON



SEP 10 2020

AT SEATTLE  
CLERK U.S. DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
BY DEPUTY

Jason Xerxes Dennis BK# 220009504  
Plaintiff's full name and prisoner number

Plaintiff,

v.

**20-CV-1347** BHS-MJP  
Case No. (leave blank – for court staff only)

Google/Google Plus  
Virgie Garabitez Dennis

PRISONER CIVIL RIGHTS  
COMPLAINT

Limbo  
Defendant's/defendants' full name(s)

Defendant(s).

Jury Demand?

☒ Yes  
☐ No

(If you cannot fit all of the defendants' names in the space provided, please write "see attached" in the space above and attach additional sheets of paper, as necessary, with the full list of names. The names listed here must be identical to those in Section II. Do not include addresses here. **Individuals whose names are not included in this section will not be considered defendants in this action.**)

WARNINGS

1. Do not use this form if you are challenging the validity of your criminal conviction or your criminal sentence. If you are challenging your conviction or sentence, or if you are seeking restoration of good-time credits that would shorten your sentence, you must file a Petition for Writ of Habeas Corpus. If you use this form to challenge your conviction or sentence, you risk having your claim dismissed. Separate forms are available for filing a habeas petition.

2. Under the Prison Litigation Reform Act ("PLRA"), you are required to exhaust all remedies in your institution's grievance system that are available to you before filing suit. This generally means that you must file a grievance and, if it is denied, appeal it through all available levels of review. Your case may be dismissed if you fail to exhaust administrative remedies, unless the administrative grievance process was not "available" to you within the meaning of the PLRA. You are not required to plead or show that you have exhausted your claim in this complaint.

3. Please review your complaint carefully before filing. If your case is dismissed, it may affect your ability to file future civil actions while incarcerated without prepaying the full filing fee. Under the PLRA, a prisoner who has had three or more civil actions or appeals dismissed as frivolous, malicious, or for failure to state a claim cannot file a new action without first paying the full filing fee, unless the prisoner is in imminent danger of serious bodily injury.

4. Under Federal Rule of Civil Procedure 5.2, papers filed with the court, including exhibits or attachments to a complaint, may not contain certain information, which must be modified as follows:

Do not include:

- a full social security number
- a full birth date
- the full name of a minor
- a complete financial account number

Instead, use:

- the last four digits
- the birth year
- the minor's initials
- the last four digits

5. You may, but do not need to, send exhibits, affidavits, grievances, witness statements, or any other materials to the Clerk's Office with this complaint. Any documents you submit *must relate directly to the claims you raise in this lawsuit*. They will become part of the court record and will not be returned to you.

#### I. PLAINTIFF INFORMATION

DENNIS, JASON XerXes

Name (Last, First, MI)

Aliases/Formal Names

BK# 220009504

Prisoner ID #

King County Correctional Facility

Place of Detention

620 W James St

Institutional Address

King/Kent

WA

98032

County, City

State

Zip Code

Indicate your status:

☒ Pretrial detainee

☐ Civilly committed detainee

☐ Immigration detainee

☐ Convicted and sentenced state prisoner

☐ Convicted and sentenced federal prisoner

**II. DEFENDANT INFORMATION**

*Please list the following information for each defendant. If the correct information is not provided, it could delay or prevent service of the complaint. Make sure that the defendant(s) listed below are identical to those contained in the caption on the first page of the complaint. Attach additional sheets of paper as necessary.*

Defendant 1:

Google/Google Plus

Name (Last, First)

Information Technology

Current Job Title

1600 Amphitheatre Pkwy.

Current Work Address

MOUNTAIN VIEW CALIFORNIA 94043

County, City

State

Zip Code

Defendant 2:

Dennis Virgie (Garabitez)

Name (Last, First)

Histotechnician/Emergency Room, Facebook and Google

Current Job Title

Swedish Hospital downtown

Current Work Address

King/seattle WA 98104

County, City

State

Zip Code

Defendant 3:

Same as Defendant 1

Name (Last, First)

Information Technology

Current Job Title

Current Work Address

1600 Amphitheatre Pkwy.

County, City

State

Zip Code

### III. STATEMENT OF CLAIM(S)

*In this section, you must explain what you believe each defendant did to violate your civil rights, and if you know, identify the federal statutory or constitutional right you believe was violated.*

*If you believe the defendant(s) violated your civil rights in more than one way, explain each violation under a different count. For example, if you believe you received constitutionally inadequate medical care and your religious rights were substantially burdened, include one claim under "Count I" (i.e., medical) and the other claim under "Count II" (i.e., religion).*

*Number your paragraphs. For example, in Count I, paragraphs should be numbered 1.1, 1.2, 1.3, etc., and in Count II, paragraphs should be numbered 2.1, 2.2, 2.3, etc. The first two paragraphs of each Count have been numbered for you.*

*If you have more than three counts, attach additional pages and follow the same format for each count.*

*If you attach documents to support the facts of your claim(s), you must specify which portion of the document(s) (i.e., page and paragraph) you are relying on to support the specific fact(s) of your claim(s). If you do not specify the portion of the supporting document(s), the Court may disregard your document(s).*

#### COUNT I

*Identify the first right you believe was violated and by whom:*

1.1 5<sup>th</sup> Amendment - Google / Google Plus  
 4<sup>th</sup> Amendment - Same as above

*State the facts of your first claim below. Include all the facts you consider important. Be specific about dates, times, locations, and the names of the people involved. Describe exactly what each specific defendant did or failed to do that caused you injury or violated your rights, and include any other facts that show why you believe what happened was wrong. If you need additional space, you may attach extra sheets.*

1.2 On the Date of Dec 6, 2018 I had 5 Guns  
 new At Different times of the day, high  
 Powered rifles and scopes, pointed at  
 me to kill me. There are a number

of people who witnessed this in public so i did some research and found a message to the general public "attn: General Public there is a all day event in which Virgie Garabiler Dennis, and Jason Dennis will be holding, but one will not be making it because he does not know how to use the google Calender" so i called the 911 and the Burien Police Officer ask me how can he help me, i told him there are 2 men on in the park and another on top of interfering with Lasers and high powered rifles and scopes pointed at me, the Officer then replied "you are not hallucinating one bit, but take my advice they can not try it again, so go home and sleep this off!"

*State with specificity the injury, harm, or damages you believe you suffered as a result of the events you described above in Count I. Continue to number your paragraphs.*

1.3 Google/Google Plus tried or attempted to  
have me killed Dec 6, 2018 in Public  
because i was not working, mentally  
terrified, I can't feel at ease at home, in public or alone, I'm scared for  
Life

COUNT II

Identify the second right you believe was violated and by whom:

2.1 My right to privacy is, and still is being Violated by google - in terms of Shadow.

State the facts of your second claim below. Include all the facts you consider important. Be specific about dates, times, locations, and the names of the people involved. Describe exactly what each specific defendant did or failed to do that caused you injury or violated your rights, and include any other facts that show why you believe what happened was wrong. If you need additional space, you may attach extra sheets.

2.2 Google has made applications like Xerxes that use heuristics to track an individual's movement online so these algorithms recognize past, present and future navigations if im online. Google pays business's to put in app tracking in their employment application to track what jobs an individual is applying to and i have proof of them Tracking me from school, to work even having my ex wife tracking me, they offer any and every body money to track certain people, a person may have a bounty on his head because he knows too much about

Information Technology, about Google's workers, Asians are the main group in my case. I know this cause I am a degree holder in IT, highest honors grad, Phoenix Award Winner, member of National Technical Honors Society.

State with specificity the injury, harm, or damages you believe you suffered as a result of the events you described above in Count II. Continue to number your paragraphs.

2.3 Mentally And Physically i'm Afraid For my Life since this all began I been shot, cut with a machete And Repeated attempts at my life and its all being channeled through google.

### COUNT III

Identify the third right you believe was violated and by whom:

3.1 Amendment 14.1 - Google - Google Plus

State the facts of your third claim below. Include all the facts you consider important. Be specific about dates, times, locations, and the names of the people involved. Describe exactly what each specific defendant did or failed to do that caused you injury or violated your rights, and include any other facts that show why you believe what happened was wrong. If you need additional space, you may attach extra sheets.

3.2 On Dec 6, 2018 Google tried to Orchestrate, Plot, And Recruit For terrorism to have me murdered here in Seattle without Due Process, conviction of Law. There are Lots of People of South King who



CAN pledge to this true Fact, they exploited my sexual intimate times with myself and or Partners, I was emailing a T.T Attorney in Chicago And they cut in And said something to the Attorney Jay Edleson And he came back on line and said he could not help me, INVASION of my Privacy. They are tracking me to Kill me for what? IT'S my right to Confront and be compensated for the Terrorism they wrongfully Brought to my life, trying to frame me. Tulsi Gabbard - governor of Hawaii is suing Google also for their evil plots. My Life is constantly in danger!

State with specificity the injury, harm, or damages you believe you suffered as a result of the events you described above in Count III. Continue to number your paragraphs.

3.3 I'm Damaged mentally for Life, my Life is at Risk everyday Cause of these evil plots I can't trust anyone, im scared to death to even have a device.



**IV. RELIEF**

State exactly what you want the Court to do for you. For example, you may be seeking money damages from an individual defendant, you may want the Court to order a defendant to do something or to stop doing something, or you may want both kinds of relief. Make no legal arguments. Cite no cases or statutes.

The fact i know there was an open Downty  
 on my head of \$123 million, Check Libre office  
 Jason Xerxes Dennis, From books to Apps made  
 of me, I'm Requesting \$124 million in Compensation  
 the Evidence will show Google Orchestrating and planning  
 my Death, I want them to leave me alone!

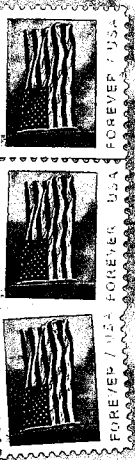
**V. SIGNATURE**

By signing this complaint, you represent to the Court that you believe the facts alleged to be true to the best of your knowledge, that you believe those facts show a violation of law, and that you are not filing this complaint to harass another person or for any other improper purpose.

9-1-2020

Dated

Jason X. Dennis  
 Plaintiff's Signature



FILED  
LOANED  
RECEIVED  
**MAIL**

SEP 10 2020

AT SEATTLE  
CLERK U.S. DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
BY

Name Jason X. Dennis  
BKG. # BK#20009504  
King County Correctional Facility  
620 West James Street  
Kent, WA 98032

U.S. District Court  
700 Stewart street  
Suite 2310  
Seattle, WA 98101